

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION

IN RE:)	
RAYMOND R. LIEBOLD)	
<u>Debtor(s)</u>)	Case No.: 5:24-00842 (MJC)
)	
SANTANDER CONSUMER USA INC.)	Chapter 13
dba CHRYSLER CAPITAL)	
<u>Movant</u>)	Docket No.
)	
v.)	11 U.S.C. 362
)	
RAYMOND R. LIEBOLD)	
<u>Respondent(s)</u>)	
)	
JACK N. ZAHAROPOULOS)	
<u>Trustee</u>)	
)	
)	
)	

**AMENDED MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER
11 U.S.C. 362 FILED ON BEHALF OF SANTANDER CONSUMER USA INC.
dba CHRYSLER CAPITAL**

1. A Chapter 13 petition was filed on April 7, 2024.
2. Relief from the automatic stay is requested with respect to personal property described as a 2018 Dodge Grand Caravan bearing vehicle identification number 2C4RDGCG1JR307035.
3. On May 31, 2019, the Debtor entered into a retail installment sales contract for the purchase of a 2018 Dodge Grand Caravan more particularly described in the following paragraph. The contract was assigned to Chrysler Capital and the Debtor became indebted to Chrysler Capital in accordance with the terms of same. To secure payment of the contract, the Debtor caused the title to the vehicle to be delivered to Chrysler Capital. As a result, Chrysler Capital is the holder of a first purchase money security interest encumbering the vehicle. Santander Consumer USA Inc. does business as Chrysler Capital. True copies of the contract and title to the vehicle are annexed hereto as **Exhibits A and B**.
4. The following information sets forth the make, model, and serial number of the vehicle, the terms of the contract, the clean retail value of the vehicle, and the current status of the Debtor's loan:
 - A. Make, model, and serial number of motor vehicle:
 1. 2018 Dodge Grand Caravan
 2. 2C4RDGCG1JR307035

- B. Contract terms:
1. Total of payments: \$29,487.75
 2. Term: 75 months
 3. Monthly payments: \$393.17
 4. First payment due: 7-15-19
- C. Value of Vehicle:
1. Clean Retail Value: \$8,600.00*
- *Value derived from NADA Official Used Car Guide, May 2025 edition.**
- D. Account Status:
1. Net Loan Balance: \$4,018.40
 2. Delinquency Status: The Debtor's account is past due post-petition from January 15, 2025 through April 15, 2025, with arrears in the amount of \$1,243.10.
5. Santander Consumer USA Inc. dba Chrysler Capital requests relief from the automatic stay for the following reasons:
- A. The Debtor is failing to make payments under the terms of the retail installment sales contract and is failing to provide Chrysler Capital with adequate protection.
 - B. Chrysler Capital has been unable to verify that the vehicle is insured. If the Debtor contests this Motion, he must provide Chrysler Capital with proof of valid, current insurance by the hearing date.

WHEREFORE, Movant prays that the Court grant the relief requested and issue the attached proposed Order.

Date: 5/20/25

/s/ William E. Craig
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